



Historic England

**RESPONSES TO EXAMINING AUTHORITY'S
QUESTIONS 10/01/2025
ON BEHALF OF THE
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HISTORIC ENGLAND)**

**Interested Party Ref No:
20050154**

**Dogger Bank South Offshore Wind Farm Projects (Reference No.
EN010125)**

Application by

RWE / MASDAR

1. Introduction

1.1 The Historic Buildings and Monuments Commission for England is generally known as “Historic England”. Historic England is the lead body for the heritage sector and the Government’s principal adviser on the historic environment. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. Historic England is an executive non-departmental public body established by s32 National Heritage Act 1983 and we answer to Parliament through the Secretary of State for Culture, Media and Sport.

1.2 The general duties of Historic England under Section 33 are as follows:

“...so far as is practicable:

- (a) to secure the preservation of ancient monuments and historic buildings situated in England;
- (b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
- (c) to promote the public’s enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation”.

1.3 We also have a role in relation to maritime archaeology under the National Heritage Act 2002 and advise Government in relation to World Heritage Sites and compliance with the 1972 Convention Concerning the Protection of the World Cultural and National Heritage.

1.4 Historic England is a statutory consultee on all Nationally Significant Infrastructure Projects.

1.5 We have been notified by you of the acceptance of the DCO application for the Dogger Bank South Offshore Wind Farm (EN010125) (“the Proposal”) and have registered as an Interested Party. We have been involved in pre-application discussion with the Applicants, and discussions with the Applicants on a number of topics is ongoing.

1.6 Historic England’s interest in this scheme is focused on the designated and non-designated but nationally important heritage assets affected by the Proposal. However, we will be deferring to the advice and recommendations of the Local Planning Authority on all matters concerning Grade II listed buildings and conservation areas.

2.0 HISTORIC ENGLAND’S RESPONSES TO THE QUESTIONS

2.1 Question ISH 2.10.10

Title: Lighting

Do you have any concerns regarding the effects from lighting on heritage assets during construction or operation of the Proposed Development?

Historic England Response

Historic England does not have concerns regarding the effects from lighting on heritage assets during the construction phase. We accept that the construction phase will be temporary, and whilst the lighting might be intrusive it will not be lasting. The effects from lighting on heritage assets during the operational phase may be more problematic. At this stage in the examination process the precise extent, scale and location of the Onshore Converter Station(s) has not been defined and agreed. As a consequence, the extent and location of the associated lighting has not been defined, and therefore it is not possible to assess or understand the wider impact of that lighting on the significance of heritage assets. For example, the applicant has not provided a visualisation of the lighting at nighttime. Similarly, the materials and finish of the proposed building(s) has not been finalised, and therefore the impact of any lighting effects on those buildings(s) and the wider landscape has not been tested.

The Scheduled World War II anti-aircraft gun site at Butt Farm (NHLE 1019186), a scheduled monument, is immediately adjacent to the proposed location of the Onshore Converter Station, and part of its significance derives from its rural setting, accentuated by dark skies. The lack of certainty concerning the scale and location of the Onshore Converter Station(s) and the associated lighting means that it is not yet possible to understand the scale of harm to significance generated by any lighting scheme. We do not have concerns regarding the effects from lighting on other designated heritage assets during the construction or operation phases of the Proposed Development. This is referred to in our Written Representation.

2.2 Question ISH 2.10.12

Title: Mitigation

In your RR [RR-022], you state that you do not consider that, 'screening through planting is an effective or lasting mitigation measure in this instance' with regards to mitigating effects on the scheduled monument close to Butt Farm. What would you suggest might be an appropriate form of mitigation? Do you consider that the proposed landscaping would provide any degree of mitigation?

Historic England Response

We consider that the suggested planting and landscape strategy is a generic approach, lacking nuance. To propose screening as an effective mitigation measure does not pay sufficient cognisance to the point that planting will always be subject to seasonal variation, the lifespan of the chosen species, wind throw, climate change and loss through disease. Clearly *all* vegetation is subject to these pressures and therefore the proposed landscaping does provide *some* degree of mitigation. However, it is also worth thinking ahead to decommissioning, and considering what sort of landscape might then obtain. Given the character and appearance of the current landscape it might be more beneficial to approach the landscape mitigation as the creation of parkland-style planting with blocks of trees and individual specimens in addition to a screen. The parkland-style approach might also be more appropriate for the landscape at and after the decommissioning phase.

The Applicants might also find it beneficial to examine and learn from the landscaping approaches adopted in the 1950s and 1960s to reduce the visual

impact of power stations and nuclear power plants in the United Kingdom. In this context, the landscape architects knowing that they could not remove the visual impact of such structures, sought to reduce it by introducing horizontal earth banding in addition to planting. We also consider that the Applicants must identify climate resilient planting species rather than select purely native species. This is referred to in our Written Representation.

However, we are aware that the Applicants has submitted a Change Request which includes revisions to the proposed Onshore Converter Station and therefore we recognise that the development proposal is fluid. All landscape proposals should be reviewed and checked by independent landscape professionals in addition to the local authority environmental and ecology team.

2.3 Question: ISH 2.10.14

Title: Historic England Recommendations

- **Are there any current cross-project forums or meetings that take place and, if so, could public outreach and community engagement aims regarding the mitigation and enhancements of heritage assets (as recommended by Historic England [RR-022]) be considered at these?**
- **Could there be a commitment in the draft DCO or any of the supporting documents to try to facilitate cross-project working?**

Historic England Response

There has been email communication between the Applicants and Historic England about public benefit, public outreach and community engagement (usually as part of emails on the subject of archaeological mitigation), in which the Applicants have expressed their willingness to engage in discussion with us about outreach and engagement. However, there have been no cross-project forums or meetings to pursue these matters.

Historic England would welcome a commitment in the draft DCO or any of the supporting documents to try to facilitate cross-project working and deliver greater public benefit.

2.4 Question ISH 2.10.16

Title: Viewpoints

Did you agree to all the cultural heritage viewpoints prior to submission of the application as suggested by the Applicants' [PDA-013]? If not, please explain any additional viewpoints you requested and why.

Historic England Response

Historic England agreed to all the cultural heritage viewpoints as suggested by the Applicants' PDA-013 (RR-022-2.2). In addition, following a site visit between the Applicants and HBMCE to Butt Farm, the Applicants and Historic England agreed additional viewpoints from a third location. This additional viewpoint is PDA-010 Fig 23.9 in the Examination Library.

Historic England is aware that the Applicants have submitted a Change Request which includes revisions to the size and location of the Onshore Converter Station. Should the revision in the Change Request be accepted it may be possible to microsite the Onshore Converter Station within the application boundary and therefore additional cultural heritage viewpoints and visualisations will be required.